



**Privacy Impact Assessment
(PIA)
Financial Management Systems
(FMS)**

Revision: 1.04



Farm Service Agency

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Document Information

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1.01	July 6, 2009	Scott Tanos	<i>Initial version</i>
1.02	July 10, 2009	D.Brizendine ISO	Updated from previous PIA doc
1.03	July 22, 2009	T. Cranwill	Updated from previous PIA doc Removed OEO-FAADS
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1 Purpose of Document

USDA DM 3515-002 states: “Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner’s requirements presents any threats to privacy.”

The Privacy Impact Assessment (PIA) document contains information on how the **Financial Management Systems** affects the privacy of its users and the information stored within. This assessment is in accordance with NIST SP 800-37 *Guide for the Security Certification and Accreditation of Federal Information Systems*.



2 System Information

System Information	
Agency:	Farm Service Agency
System Name:	Financial Management Systems
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	<p>Financial Management Systems (Financial Management) consists of:</p> <ul style="list-style-type: none">Financial Management System (FMS) which collects service center accounting transactions transmitted from the State and Counties and the National Payment Service (NPS) and passes validated data to CORE for the generation of accounting entries;Financial Management Reporting System Data Warehouse (FMRS) which facilitates querying, reporting and analysis to enable users to provide timely financial reporting, to provide better customer service, and to make better business decisions via standardized and ad hoc reports;CORE General Ledger System which was implemented to provide one system for FSA appropriated fund/administrative accounting and for CCC accounting;IRS Reporting System which extracts IRS reportable information recorded in the Price Support System for loan forfeiture, settlement and abandonment, printing of producer reports (CCC-1099-A), and transmission of reportable data to KC and records IRS reportable payments made to producers and provides a wide range of reports to various organizations inside and outside the FSA.
Who owns this system? (Name, agency, contact information)	Angela Sieg FSA/ITSD/ADC/AFAO (816) 926-1568 Angela.Sieg@kcc.usda.gov



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System Information	
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (ISSPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 Brian.Davies@wdc.usda.gov
Who completed this document? (Name, agency, contact information)	Thomas Cranwill (816) 926-2154 thomas.cranwill@kcc.usda.gov



3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	<p>Customer: Name, Address, TIN/SSN, banking information, delinquent debt and debtor information, information about the payment(s) made to the farmer/producer, SCIMS Core ID, program code and Treasure Referral Status based on TIN.</p> <p>Employee: eAuth user ID</p> <p>Other: Detail program data is maintained at the State and County Office</p> <p>CORE: Summarized program data is passed to CORE from FMS-SCOAP and other systems.</p> <p>FMS-SCOAP: Detail transaction data is passed to multiple subsidiary systems and also retained in FMS-SCOAP (SCOAP2 database).</p> <p>Financial Management Reporting System Data Warehouse: Detail transaction data is received from FMS-SCOAP. Summary transaction data is passed from CORE to the reporting data marts.</p> <p>IRS Reporting System: State Code, County Code, Tax ID, Tax ID Type (E, I, S) payee name and address, amount paid, program identification, transaction date, Group Entry Stamp. PPRS Customer – Payment Management Office, Payment Reporting & Finance Group, producers and IRS.</p>



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No.	Question	Response
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	Per IRS guidance FSA payments are reportable to the IRS and the Recipients. The Internal Revenue Service adopted the SSN as its official taxpayer identification number in 1962.
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The data is used for service center and National Payment Service (NPS) accounting transactions. CORE: The data is used for financial reporting purposes. IRS Reporting System: PPRS Sensitive data is required to comply with IRS mandates for reporting of taxable benefits for the producer and FSA.
4	Sources of the data in the system.	Manual input from County via System 36 and transmitted to the Kansas City Comm Center. NPS data is merged with county office transmissions and are input to FMS Federal Agency Sources: AMS, FNS, Kansas City Commodity Office, FSA, Department of Justice, US Treasury, Minneapolis Federal Reserve Bank



No.	Question	Response
		<p>CORE: Manual inputs by FSA employees; Financial Management System -- State & County Office Automation Project (FMS-SCOAP) Farm Storage Facility Loans (FSFL) Financial & Accounting Information Reporting System (FAIRS) Conservation (Obligations) Automated Cotton Reporting System (ACRS) Centralized Disbursement System (CDS) Grain Inventory Management System (GIMS) Processed Commodities Inventory Management System (PCIMS) Cotton Online Processing System (COPS) Informix: Core Warehouse</p> <p>Financial Management Reporting System Data Warehouse: Detail transaction data is received from FMS-SCOAP. Summary transaction data is passed from CORE to the reporting data marts.</p> <p>IRS Reporting System: US Treasury PPRS Information comes from producers when they sign up for access (placed in SCIMS). As producers receive IRS reportable farm program payments, activity is processed through the AE7 application. Data for PPRS is split off and provided as a detail transaction. Detail payment data is processed weekly and applicable data bases are updated with the current activity. Data is verified for accuracy and referential integrity is utilized. Verification of the data and error resolution is provided by the Payment Reporting & Finance group</p>



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No.	Question	Response
4.1	What data is being collected from the customer?	Name, Address, SSN, TIN IRS Reporting System: PPRS State Code, County Code, payee Tax ID, tax ID type code, program code, transaction type, time stamp, transaction amount, transaction date, program year, Information from SCIMS, name and address, income
4.2	What USDA agencies are providing data for use in the system?	Financial Management System: Farm Service Agency CORE: (FSA is the source agency for all data received from the applications listed in 4.0) IRS Reporting System: FSA State and County offices
4.3	What state and local agencies are providing data for use in the system?	none
4.4	From what other third party sources is data being collected?	Cotton Cooperatives, Peanut Marketing Association, banking institutions, CADE Data File, Farmers, Producers, vendors.
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 6. Customer information is collected by FSA State and County offices.



No.	Question	Response
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	<p>Accuracy will be verified using:</p> <p>Standard Accounting Practices; CTCS has Interface stats reports and balancing controls, Automated system validations.</p> <p>Completeness will be checked using a mixture of human and automated review by :</p> <ul style="list-style-type: none">-System edit validations,-Daily balancing comparing General Ledger activity with applicable subsidiaries.-Each payment must contain minimal FSA accounting information or the payment will be rejected. Service Center employees are responsible for the 'certification' approval and 'signing' approval of each payment request.-Control records on batch interface files-Validation before entry into CORE-Accountants and Management review the data for accuracy and completeness prior to manual input into the CORE general ledger. <p>IRS Reporting System:</p> <p>The PPRS system provides numerous control reports depicting all totals and balances within the various calendar year data bases. The Payment Reporting & Finance Group verifies accuracy of the processing by using the PPRS reports and control reports supplied by feeder systems. Error records are researched and out of balance conditions are analyzed and resolved prior to the next processing. If out of balance conditions are encountered during the weekly update procedure the system will ABEND providing an error message.</p>
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	See 5.1 above
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	See 5.1 above



3.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	Financial Management System: FOIA provides member payment data (1614) to requesting organizations for statistical and public reporting. CORE: Financial statement reporting. IRS Reporting System: reporting information to IRS
7	Will the data be used for any other purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	Farm program payment statistical reporting purposes. Adhoc request from other government agencies.
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	



No.	Question	Response
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	The data is used for service center and National Payment Service (NPS) accounting transactions. The CORE data is used for financial reporting purposes. The IRS Reporting System – PPRS data is required to comply with IRS mandates for reporting of taxable benefits for the producer and FSA.
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	Financial Management System: Up to 6 years and longer in some instances. CORE: Detailed – 24 months; General Ledger – 5 years plus current. IRS Reporting System: 3 years



No.	Question	Response
14.2	What are the procedures for purging the data at the end of the retention period?	Financial Management System: Refer to USDA standard media disposal policy and procedure found in FSA 6-IRM and USDA DR 3601-001 IRS Reporting System: NITC File Maintenance Procedures for Scratch files
14.3	Where are these procedures documented?	Financial Management System: Refer to USDA standard media disposal policy and procedure found in FSA 6-IRM and USDA DR 3601-001 IRS Reporting System: NITC File Maintenance Procedures for Scratch files
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	Financial Management System: Data, after completion is not altered. The information is protected by agency policies and the security controls issued by USDA. The key is to ensure the accuracy of this data prior to entering it into the system. The key method utilized is the Acceptance Testing process. IRS Reporting System: Internal Controls
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

3.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 18. Financial Management System: Data from 1614 is extracted from FMRS and provided to the FOIA group for disbursement IRS Reporting System: IRS , Government Agencies upon request, FOIA requests.



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No.	Question	Response
17.1	How will the data be used by the other agency?	Financial Management System: FOIA provides member payment data (1614) to requesting organizations for statistical and public reporting. CORE: Eliminations entry for financial statements. IRS Reporting System: Reporting information to the IRS
17.2	Who is responsible for assuring the other agency properly uses the data?	Financial Management System: FOIA CORE: Receiving agency is responsible for following OMB guidance. IRS Reporting System: FSA/FMD
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 20. Financial Management System and CORE: - No IRS Reporting System: Yes
19.1	How will consistent use of the system and data be maintained in all sites?	IRS Reporting System: Consult 61RM for details of the configuration management process for this system.



3.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Financial Management System: Users, Managers, System Administrators, Developers CORE: FSA Users, Managers, System Administrators, Developers IRS Reporting System: Users, System Administrators, Developers, IT Personnel
21	How will user access to the data be determined?	Financial Management System: Data is segregated by functional responsibility. FAO maintains the internal application security table CORE: User access is determined by the user's supervisor based on duties and functions. IRS Reporting System: Access is determined by discretion of management. Users must have valid reason to access data.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



No.	Question	Response
22	How will user access to the data be restricted?	<p>Financial Management System: No restrictions to read data. Write capabilities are restricted by User ID. FAO maintains the internal application security table.</p> <p>CORE: Data access is managed through role based security restrictions and rules.</p> <p>IRS Reporting System: Access to PPRS is granted through the security office and DBMO. Managers submit employees for access. Only Payment Management staff is granted UPDATE access to PPRS support tables. These tables include Category Code, Transaction Code, Program Name, Commodity Code and Program Code tables. Pursuant to referential integrity constraints, a strict sequence of input must be followed when inputting new program code information, etc. SELECT (Read only) access is granted for detail tables according to the employee needs. For the IRS 1099-A portion, once authorized, users have access to all data.</p>
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures , etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Financial Management System and CORE: Unauthorized Users are not permitted to access CORE data.</p> <p>IRS Reporting System: Security Training, level of authorities granted and on what tables within the DB</p>

3.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	USDA Privacy Office



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No.	Question	Response
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	By contacting John Underwood, Privacy Officer, at john.underwood@kcc.usda.gov & 816.926.6992
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	<input checked="" type="checkbox"/> Yes – If YES, go to question 27. Common FSA incident reporting process. <input type="checkbox"/> No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: Consolidation and linkage of files and systems Derivation of data Accelerated information processing and decision making Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	N/A
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	

4 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Data is retrieved based on level it was recorded. Financial Management Systems and FMRS: SSN CORE: Program IRS Reporting System PPRS: Data can be retrieved by personal ID. The personal ID is used as a key to retrieve pertinent data from the system. Employee access is strictly monitored.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov .)	Financial Management Systems CORE: Farm Records File-automated – USDA/FSA-2 Claims Data Base-automated– USDA/FSA-13 Applicant/Borrower – USDA/FSA-14 IRS Reporting System: USDA/FSA-2 Farm Records File (Automated), USDA/FSA-14 Applicant/Borrow
30.3	If the system is being modified, will the SOR require amendment or revision?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Possibly if the modification results in data, record storage location, or routine use that is not covered by the SOR identified above.

5 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	



6 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.